

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re
**ANGEL QUIÑONES AYALA, AND EDIRSA
MARTINEZ MARQUEZ**
Debtor(s)

Case No. **11-08517-MCF**

Chapter **13**

**MOTION TO INFORM AMENDMENT TO SCHEDULE C
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

COME(S) Now Debtor(s) represented by the undersigned counsel, and respectfully state(s) and pray(s) as follows:

1. On today's date Debtors are filing an Amended Schedule C, **with the purpose of eliminating the exemption for the real property located at Chalet de la Playa.**

2. Such Amended Schedule, and the present motion, were notified through CM/ECF to all CM/ECF participants, including the US Trustee and the Chapter 13 Trustee, and was served via regular US Mail to all other creditors and parties in interest at the mailing addresses listed below.

WHEREFORE, Debtor(s) hereby pray from this Honorable Court to take notice of the above.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of such filing to all CM/ECF participants including the US Trustee, and the Chapter 13 Trustee.

I FURTHER CERTIFY that on this same date I sent a copy of the present document through regular US Mail to all other creditors and parties in interest who are not CM/ECF participants at the following addresses:

ANGEL QUIÑONES AYALA & EDIRSA MARTINEZ MARQUEZ 5 CHALETS DE LA PLAYA APTO. 136 Vega Baja, PR 00693-9748; **AEE** PO BOX 363508 San Juan, PR 00936-3508; **ALARM DEPOT** 300 SIERRA AVE. BOX 120 San Juan, PR 00926; **ASOC. CONDOMINES CHALETS DE LA PLAYA** PMB 253 PO BOX 4560 Caguas, PR 00726-4960; **B. FERNANDEZ & HERMANOS, INC.** URB. IND. LUCHETTI 305 CARR 5 , PR 00996; **BALLESTER HERAMANOS, INC** PO BOX 364548 San Juan, PR 00936-4548; **BANCO POPULAR** BANKRUPTCY DEPT. PO BOX 366818 San Juan, PR 00936-6818; **BANK OF AMERICA** 100 NORTH TRYON STREET Charlotte, NC 28255; **BBVA** PO BOX 364745 San Juan, PR 00936-4745; **CARLOS VEGA, ESQ.** PO BOX 4082 Vega Baja, PR 00694; **CITIFINANCIAL** PO Box 70919 Charlotte, NC 28272-0919; **COLOSO FOODS, INC.** PO BOX 363013 San Juan, PR 00936-3013; **COOPERATIVA DE A/C VEGA ALTA** PO BOX 1078 VEGA ALTA, PR 00692; **CORP. FONDO DEL SEGURO DEL ESTADO** PO BOX 365028 San Juan, PR 00936-5028; **CRESCA CORP.** PMB 92 PO BOX 71325 San Juan, PR 00936; **CRIM** PO BOX 195387 San Juan, PR 00919-5387; **DEPARTAMENTO DE LA VIVIENDA** PO BOX 21365 San Juan, PR

00928-1365; **DIRECT TV** PO BOX 71413 San Juan, PR 00936-8513; **FIA CARD SERVICES** 1000 SAMOSET DRIVE DE5-023-03 Newark, DE 19713; **GE MONEY BANK** PO Box 103104 Roswell, GA 30076; **INTERNAL REVENUE SERVICE-V** PO BOX 7346 Philadelphia, PA 19101-7346; **JAR FOOD DISTRIBUTORS, INC.-V** PO BOX 158 Catano, PR 00963; **JOSE E. OYOLA CALDERON** HC 03 BOX 8834 RIO LAJAS Dorado, PR 00646; **JUAN J. RODRIGUEZ, JR.** BO. RIO LAJAS PARCELA 7-4 Dorado, PR 00646; **KELLOGG CARIBBEAN SERVICE, INC.** PO BOX 2549 Bayamon, PR 00960-2549; **LC DISTRIBUTORS, INC** PO BOX 361709 San Juan, PR 00936; **LOTERIA DE PUERTO RICO** 383 AVE. ROOSEVELT SUITE 107 San Juan, PR 00918-2143; **LVNV FUNDING LLC** PO Box 10587 Greenville, SC 29603-0587; **MADLINE RIVERA** STREET #9, BLOCK #47 RIO LAJAS Dorado, PR 00646; **MI PAN ASOCIADOS** APARTADO 174 Sabana Seca, PR 00952; **MIDRED BRACERO PAGAN** CALLE #3 PARCELA 7A RIO LAJAS Dorado, PR 00646; **NCO FINANCIAL SYSTEMS** 507 PRUDENTIAL ROAD Horsham, PA 19044; **NESTLE PUERTO RICO, INC.** PO BOX 15069 San Juan, PR 00902-8569; **PEPSICO CARIBBEAN, INC.** D/B/A FRITO LAY PO BOX 70276 San Juan, PR 00936; **PLAZA PROVISIONS** PO BOX 363328 San Juan, PR 00936-3328; **PPG PRESTIGE PROPERTY GROUP, INC.** PMB 253 PO BOX 4960, PR 00776-4960; **PR TREASURY DEPARTMENT** BANKRUPTCY SECTION (SUITE 1504) 235 AVE ARTERIAL HOSTOS SAN JUAN, PR 00918; **PUERTO RICO SUPPLIES CO, INC.** PO BOX 11908 San Juan, PR 00922; **RAQUEL ORTIZ LOPEZ** BO. CAMPANILLA CALLE FORTALEZA #370 Toa Baja, PR 00949; **RG MORTGAGE CORP.** PO BOX 362394 San Juan, PR 00936-2394; **RJ REYNOLDS** PO BOX 363509 San Juan, PR 00936-3509; **SAN JUAN TRADING** PO BOX 366458 San Juan, PR 00936-6458; **SEARS/CBSD** PO Box 6275 Sioux Falls, SD 57117-6275; **SUPERMERCADO SHADDAI** CALLE 9 #47 RIO LAJAS Dorado, PR 00646; **T-MOBILE** PO Box 37380 Albuquerque, NM 87176-7380; **TROFIMA, CORP.** PO BOX 877 Arecibo, PR 00613-0877; **V. SUAREZ, INC.** PO BOX 364588 San Juan, PR 00936-4588; **VAQUERIA TRES MONJITAS, INC.** PO BOX 366757 San Juan, PR 00936-6757;

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this November 10, 2011.

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In re **ANGEL QUIÑONES AYALA,
EDIRSA MARTINEZ MARQUEZ**Case No. **11-08517-MCF**

Debtors

SCHEDULE C - PROPERTY CLAIMED AS EXEMPT - AMENDED

Debtor claims the exemptions to which debtor is entitled under:

(Check one box)

☒ 11 U.S.C. § 522(b)(2)☐ 11 U.S.C. § 522(b)(3)☐ Check if debtor claims a homestead exemption that exceeds \$146,450. (Amount subject to adjustment on 4/1/13, and every three years thereafter with respect to cases commenced on or after the date of adjustment.)

Description of Property	Specify Law Providing Each Exemption	Value of Claimed Exemption	Current Value of Property Without Deducting Exemption
Household Goods and Furnishings			
HOUSEHOLD GOODS AND FURNISHINGS:	11 U.S.C. § 522(d)(3)	3,000.00	3,000.00
LIVING ROOM SET, DINING ROOM SET, BEDROOM SET, 3 AIR CONDITIONER, 3 TVS, STOVE, REFRIGERATOR, MICROWAVE WASHER, DRYER AND GENERAL HOUSEHOLD GOODS AND KITCHEN EQUIPMENT.			
Wearing Apparel			
WEARING APPAREL	11 U.S.C. § 522(d)(3)	800.00	800.00
Furs and Jewelry			
JEWELRY	11 U.S.C. § 522(d)(4)	2,900.00	3,000.00
Firearms and Sports, Photographic and Other Hobby Equipment			
FIREARMS: .40 GLOCK	11 U.S.C. § 522(d)(3)	350.00	350.00
Interests in an Education IRA or under a Qualified State Tuition Plan			
IRA WITH BANCO POPULAR	11 U.S.C. § 522(d)(12)	1,600.00	1,600.00
IRA WITH BANCO POPULAR	11 U.S.C. § 522(d)(12)	531.32	531.32
IRA WITH BANCO POPULAR	11 U.S.C. § 522(d)(12)	531.32	531.32
Automobiles, Trucks, Trailers, and Other Vehicles			
2006 MITSUBISHI OUTLANDER (4D)(AUT)	11 U.S.C. § 522(d)(2)	3,450.00	13,420.00
MILEAGE: 74,000 VIN NO.:JA4LX41F76U015738			
1998 FORD ECONOLINE (2D)(AUT)	11 U.S.C. § 522(d)(2)	2,925.00	2,925.00
MILEAGE:220,873 VIN NO.1FTNE24LXWHB79343			
Machinery, Fixtures, Equipment and Supplies Used in Business			
EQUIPMENT: 1 REFRIGERATOR (5 DOORS)(\$3,000.00); 1 FREFRIGERATOR (1 DOOR) (\$200.00); REFRIGERATOR 12"-DAIRY (\$1,600.00); REFRIGERATOR (\$1,000.00); FREEZER (\$1,500.00); ELECTRIC GENERATOR (\$5,000.00); DATABASE, 5 COMPUTERS AND 2 SCANNERS (\$1,000.00); MEAT GRINDER (\$500.00); MEAT POUNDER (\$100.00); 2 BALANCE (\$100.00); SAW (\$300.00); SLICE MACHINE (\$150.00); 4 STANLESS STEEL TABLES (\$150.00); FREEZER 10X10 (\$800.00); GONDOLAS 144' (\$1,500.00); 2 COUNTERS (\$500.00); 2 SHELVES (\$600.00); CAMERA SYSTEM (\$500.00); 4 MOTORS (\$1,200.00); TV (\$300.00).	11 U.S.C. § 522(d)(6)	2,175.00	20,000.00

Total:	18,262.64	46,157.64
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0 continuation sheets attached to Schedule of Property Claimed as Exempt

**United States Bankruptcy Court
District of Puerto Rico**

In re **ANGEL QUIÑONES AYALA and
EDIRSA MARTINEZ MARQUEZ**
Debtor(s)

Case No. **11-08517-MCF**
Chapter **13**

**DECLARATION CONCERNING DEBTOR'S AMENDED SCHEDULE C
AND STATEMENT OF PURPOSE**

DECLARATION UNDER PENALTY OF PERJURY BY INDIVIDUAL DEBTOR

I declare under penalty of perjury that I have read the foregoing schedule(s), consisting of 1 sheet(s), and that they are true and correct to the best of my knowledge, information, and belief.

Declaro bajo pena de perjurio que he leído el reporte ("Schedule") que antecede, consistente en 1 hoja(s), y que el mismo es cierto y correcto, a mi mejor conocimiento, información y creencia.

I likewise declare that the amendment submitted herein is made with the purpose of eliminating the exemption for the real property located at Chalets de la Playa.

Declaro de la misma forma que la enmienda que se somete se hace con el propósito de eliminar exención para la propiedad Chalets de la Playa.

Date November 10, 2011

Signature /s/ ANGEL QUIÑONES AYALA
ANGEL QUIÑONES AYALA
Debtor

Date November 10, 2011

Signature /s/ EDIRSA MARTINEZ MARQUEZ
EDIRSA MARTINEZ MARQUEZ
Joint Debtor

Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.